

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK**

RICHARD STRANG and ERASMIA
DEAVER, individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

FERGUSON ENTERPRISES, LLC,

Defendant.

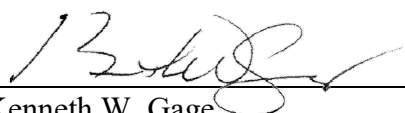
Civil Action No. **1:23-cv-352 (MAD/CFH)**

**NOTICE OF MOTION TO COMPEL
ARBITRATION AND STAY
PROCEEDINGS**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law and Declarations of Kenneth W. Gage, Jeffrey Clancy (with attached exhibits), Marissa Furforo (with attached exhibit), Declaration of Teresa Cooper (with attached exhibit), declaration of Charlotte Murch (with attached exhibit) and Jessica Pena (with attached exhibits), Defendant Ferguson Enterprises, LLC (“Ferguson”), by its undersigned counsel, shall move before the United States District Court for the Northern District of New York for an Order granting its motion to compel arbitration of the claims of Plaintiffs Richard Strang and Erasmia Deaver (“Plaintiffs”) against Ferguson and to stay this action pending the disposition of Plaintiffs’ claims in arbitration. Pursuant to Local Rule 7.1(a), Ferguson respectfully requests oral argument in the event its Motion is opposed. Unless otherwise ordered by the Court, Plaintiffs’ opposition to the Motion, if any, is due twenty-one (21) days after the service of the Motion. Ferguson’s reply brief, if any, is due seven (7) days after the service of Plaintiffs’ opposition papers.

Dated: May 19, 2023

PAUL HASTINGS LLP



Kenneth W. Gage
Matthew S. Aibel (*pro hac vice*
admission pending)

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*Attorneys for Defendant
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